

## Exhibit “B”

### Declaration of Skipp Porteous

THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHANEL, INC.,  
a New York corporation,

Plaintiff,

v.

LINDA ALLEN a/k/a LINDA ROONEY a/k/a  
COURTNEY ALLEN d/b/a  
EUROPEANBEAUTYFASHIONS.COM d/b/a  
EUROPEAN BEAUTY FASHIONS d/b/a  
MYCLASSYFASHION.COM d/b/a  
MY CLASSY FASHION d/b/a  
ULTIMATEDESIGNERSHANDBAGS.COM  
d/b/a ULTIMATE DESIGNER HANDBAGS  
and DOES 1-10,

Defendants.

CASE NO. 07-cv-4858 (NRB)

**DECLARATION OF SKIPP  
PORTEOUS IN SUPPORT OF  
MEMORANDUM OF POINTS  
AND AUTHORITIES IN  
SUPPORT OF REQUEST FOR  
DAMAGES**

1. My name is Skipp Porteous, and I am an officer of Sherlock Investigations, Inc., a licensed private investigative firm located in New York, New York.

2. I am over 18 years of age and have personal knowledge of the facts set forth herein. If called upon to do so, I could and would competently testify as to the following facts in support of Chanel's Memorandum of Points and Authorities in Support of Request for Damages against Defendant Linda Allen a/k/a Linda Rooney a/k/a Courtney Allen d/b/a European Beauty Fashions d/b/a EuropeanBeautyFashions.com d/b/a My Classy Fashion d/b/a MyClassyFashion.com d/b/a UltimateDesignersHandbags.com d/b/a Ultimate Designer Handbag ("Allen").

3. In or about December 2004, my firm was retained by Chanel, Inc. ("Chanel") to investigate the suspected sale of counterfeit Chanel products by Allen through her website EuropeanBeautyFashions.com.

Declaration of Lynnette Oka

4. On or about December 14, 2004, I conducted a WHOIS search of Allen's website "EuropeanBeautyFashions.com" through NetworkSolutions.com and determined that the domain name was created on July 15, 2004. The Registrant and the Administrative Contact is listed as Linda Allen, 342 Cold Spring Road, Syosset, New York 11791, (516) 921-0836, beautyfashions1@yahoo.com." A true and correct copy of the www.NetworkSolutions.com Whois printout in connection with Allen's website EuropeanBeautyFashions.com is attached hereto as Exhibit "1."

5. In or about December, 2004, I conducted a search of the telephone number, (516) 921-0836, identified on the WHOIS printout for Allen's website EuropeanBeautyFashions.com. I determined the owner of the telephone number was Neil Allen and the number rings to the physical address 342 Cold Spring Road, Syosset, New York 11791.

6. On or about December 14, 2004, I accessed Allen's fully interactive Internet website EuropeanBeautyFashions.com and placed an order for the purchase of a handbag bearing the Chanel Marks at issue in this action for \$79.00, including shipping.

7. On or about December 17, 2004, I received the handbags purchased from Allen through her website EuropeanBeautyFashoin.com which was shipped via U.S. Mail. The return address on the outer package identified the shipper's address as 342 Cold Spring Road, Syosset, New York 11791. A true and correct photograph of the handbag I purchased from Allen through her website EuropeanBeautyFashions.com together with a true and correct copy of the Chain of Custody are attached hereto as Composite Exhibit "2."

8. The handbag I purchased from Allen, together with the Chain of Custody, were sent to Chanel for authentication. Chanel's representative confirmed the handbag I purchased from Allen through her website EuropeanBeautyFashions.com was counterfeit.

9. Since my firm's retention by Chanel on this matter, my firm has billed Chanel, and been paid, a total of \$635.65 for investigative fees and buy money to investigate the Allen's counterfeiting activities through her website EuropeanBeautyFashions.com.

I declare under penalty of perjury that the foregoing is true and correct.

FURTHER DECLARANT SAYETH NAUGHT.

Dated this 3rd day of April, 2008.

A handwritten signature in black ink, appearing to read "SKIPP PORTEOUS", written over a horizontal line.

Skipp Porteous

## Exhibit “1”

Make a WHOIS search on any domain on the Web | Network Solutions

Page 1 of 2

Network Solutions®

FREE OFFERS

WHOIS

VIEW ORDER

CUSTOMER SERVICE

ACCOUNT MANAGER LOGIN

HOME

REGISTER  
A DOMAIN

CREATE A  
WEB SITE

BUY  
E-MAIL

PURCHASE  
HOSTING

PROMOTE  
YOUR SITE

GROW YOUR  
BUSINESS

TRANSFER  
YOUR DOMAINS

RENEW  
SERVICES

## Private Registration

Protect your privacy from spammers and telemarketers

## WHOIS SEARCH RESULTS

### WHOIS RECORD FOR

europeanbeautyfashions.com

Certified Offer Service - Make an offer on this domain

Backorder - Try to get this name when it becomes available

Similar Names - See suggested alternatives for this domain

Domain Name..... europeanbeautyfashions.com  
Creation Date..... 2004-07-15  
Registration Date.... 2004-07-15  
Expiry Date..... 2005-07-15  
Organisation Name.... Linda Allen  
Organisation Address. 342 cold spring rd  
Organisation Address.  
Organisation Address. Syosset  
Organisation Address. 11791  
Organisation Address. NY  
Organisation Address. UNITED STATES

Admin Name..... Linda Allen  
Admin Address..... 342 cold spring rd  
Admin Address.....  
Admin Address..... Syosset  
Admin Address..... 11791  
Admin Address..... NY  
Admin Address..... UNITED STATES  
Admin Email..... beautyfashions1@yahoo.com  
Admin Phone..... +1.5169210836  
Admin Fax.....

Tech Name..... YahooDomains TechContact  
Tech Address..... 701 First Ave.  
Tech Address.....  
Tech Address..... Sunnyvale  
Tech Address..... 94089  
Tech Address..... CA  
Tech Address..... UNITED STATES  
Tech Email..... domain.tech@YAHOO-INC.COM  
Tech Phone..... +1.6198813096  
Tech Fax..... +1.6198813010  
Name Server..... yns1.yahoo.com  
Name Server..... yns2.yahoo.com

The previous information has been obtained either directly from the registrant or a registrar of the domain name other than Network Solutions. Network Solutions, therefore, does not guarantee its accuracy or completeness.

Show underlying registry data for this record

Current Registrar:

MELBOURNE IT, LTD. D/B/A INTERNET NAMES  
WORLDWIDE

### BUY THE AVAILABLE EXTENSIONS FOR THIS DOMAIN NAME

europeanbeau... ☒ .net  
europeanbeau... ☒ .org  
europeanbeau... ☒ .info  
europeanbeau... ☒ .biz  
europeanbeau... ☒ .us  
europeanbeau... ☒ .ws  
europeanbeau... ☒ .vg  
europeanbeau... ☒ .gs  
europeanbeau... ☒ .tc  
europeanbeau... ☒ .ms

CONTINUE

### SEARCH AGAIN

Enter a search term:

e.g. networksolutions.com

Search by:

- ☒ Domain Name  
☐ NIC Handle  
☐ IP Address

SEARCH

### RELATED CATEGORIES

fashion  
beauty  
clothing labels  
cosmetic surgery  
plastic surgery

beauty products  
beauty supply  
beauty supplies  
beauty treatment  
beauty care

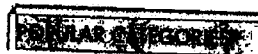
http://www.networksolutions.com/en\_US/whois/results.jhtml;jsessionid=CD1A2HA1VE5YMCWKEA... 12/14/2004

CH0004

Make a WHOIS search on any domain on the Web | Network Solutions

Page 2 of 2

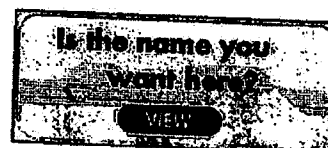
**IP Address:** 66.218.79.157 (ARIN & RIPE IP search)  
**IP Location:** US(UNITED STATES)-CALIFORNIA-SUNNYVALE  
**Record Type:** Domain Name  
**Server Type:** Other  
**Lock Status:** ACTIVE  
**DMOZ:** no listings  
**Y! Directory:** see listings  
**Secure:** No  
**E-commerce:** No  
**Traffic Ranking:** Not available  
**Data as of:** 08-Jun-2004



[Travel](#)  
[Car Rental](#)  
[Hotels](#)  
[Airline](#)

[Financial Planning](#)  
[Debt](#)  
[Credit Cards](#)  
[Loans](#)

[Business and Finance](#)  
[Affiliate Program](#)  
[Student Loans](#)  
[Stocks](#)



When you register a domain name, current policies require that the contact information for your domain name registration be included in a public database known as WHOIS. To learn about actions you can take to protect your WHOIS information visit [www.internetprivacyadvocate.org](http://www.internetprivacyadvocate.org).

**NOTICE AND TERMS OF USE:** You are not authorized to access or query our WHOIS database through the use of high-volume, automated, electronic processes or for the purpose or purposes of using the data in any manner that violates these terms of use. The Data in Network Solutions' WHOIS database is provided by Network Solutions for information purposes only, and to assist persons in obtaining information about or related to a domain name registration record. Network Solutions does not guarantee its accuracy. By submitting a WHOIS query, you agree to abide by the following terms of use: You agree that you may use this Data only for lawful purposes and that under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, e-mail, telephone, or facsimile; or (2) enable high volume, automated, electronic processes that apply to Network Solutions (or its computer systems). The compilation, repackaging, dissemination or other use of this Data is expressly prohibited without the prior written consent of Network Solutions. You agree not to use high-volume, automated, electronic processes to access or query the WHOIS database. Network Solutions reserves all rights and remedies it now has or may have in the future, including, but not limited to, the right to terminate your access to the WHOIS database in its sole discretion, for any violations by you of these terms of use, including without limitation, for excessive querying of the WHOIS database or for failure to otherwise abide by these terms of use. Network Solutions reserves the right to modify these terms at any time.

[Back to top](#) | [About Us](#) | [Partnerships](#) | [Customer Service](#) | [Site Map](#)

[Home](#) [Register a Domain](#) [Create a Web Site](#) [Buy E-mail](#) [Purchase Hosting](#) [Promote Your Site](#) [Grow Your Business](#) [Transfer Your Domains](#) [Renew Services](#) [Account Manager](#)

[Review our Policies, Service Agreement, and Legal Notice](#)  
 © Copyright 2004 Network Solutions. All rights reserved.



## Composite Exhibit “2”

Sherlock Investigations, Inc.  
170 West End Avenue, 2T, New York NY 10023  
TEL 212-579-4302 FAX 212-579-4910  
skipp@sherlockinvestigations.com www.sherlockinvestigations.com

**Chain of Custody**

Description of Evidence: Tan/blk quilted Bag w/ Chanel (X) Symbol

Date obtained: 12/29/04

How obtained: USPS - Priority - Doorman @ 150 WEA.

Received by: Constance M. Noyes

Place: 150 West End Avenue 27th Fl Time: 1:40 pm Date: 12/20/04  
10023

Relinquished by: Constance M. Noyes

Received by: [Signature]

Place: 170 West End Ave 2T Time: 4:30 P.m Date: 10/08/04  
N.Y. 10023

Relinquished by: [Signature]

Received by: \_\_\_\_\_

Place: \_\_\_\_\_ Time: \_\_\_\_\_ Date: \_\_\_\_\_

Relinquished by: \_\_\_\_\_

Received by: \_\_\_\_\_

Place: \_\_\_\_\_ Time: \_\_\_\_\_ Date: \_\_\_\_\_

Relinquished by: \_\_\_\_\_

